## COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

APPLICATION OF COLUMBIA GAS OF	)	
KENTUCKY, INC. FOR AN ADJUSTMENT	)	Case No. 2009-00141
OF RATES FOR GAS SERVICE	)	

ATTORNEY GENERAL'S MOTION FOR EXTENSION TO FILE RESPONSES TO SOME DATA REQUESTS FROM COMMISSION STAFF AND FROM COLUMBIA GAS OF KENTUCKY, INC.

Comes now the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, and hereby moves the Commission for an extension of time to file his responses to certain of the data requests propounded by Columbia Gas of Kentucky, Inc. ["the company"] and the Commission Staff.

In support of this motion, counsel states that he is on this date filing responses to the company's data requests directed to two of the four expert witnesses the Attorney General retained to provide testimony in the above-styled matter.¹ The Attorney General is also providing responses to all questions propounded by Commission Staff, but will have to late file a CD containing supporting documentation for the Staff requests directed to Dr. J. Randall Woolridge. Additionally, the Attorney General requires additional time to obtain responses to requests the company directed to Dr. J. Randall Woolridge.

<sup>&</sup>lt;sup>1</sup> The company did not propound requests to Attorney General witness Michael Majoros.

Counsel believes he will be able to file these particular responses, together with a CD containing supporting documentation, no later than Wednesday, August 26, 2009. Further, he will e-mail copies of same to counsel of record as soon as they become available, and will ship the CD to counsel for the company via overnight express.

WHEREFORE, the Attorney General respectfully requests that the Commission grant his motion.

Respectfully submitted,

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## Certificate of Service and Filing

Counsel certifies that an original and ten photocopies of the foregoing were served and filed by hand delivery to Jeff Derouen, Executive Director, Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40601; counsel further states that true and accurate copies of the foregoing were sent via electronic mail, and mailed via First Class U.S. Mail, postage pre-paid, to:

Hon. Stephen B. Seiple Attorney at Law Columbia Gas of Kentucky, Inc. P.O. Box 117 Columbus, OH 43216-0117

Hon. Richard S. Taylor Attorney at Law Capital Link Consultants 225 Capital Avenue Frankfort, KY 40601

Hon. Matthew Malone Hurt, Crosbie & May, PLLC The Equus Bldg. 127 W. Main St. Lexington, KY 40507

Hon. W.L. Wilson Lexington-Fayette Urban-County Government Department of Law 200 East Main Street Lexington, Kentucky 40507

Hon. David F. Boehm Boehm, Kurtz & Lowry 36 E. 7th Street Ste. 1510 Cincinnati, Ohio 45202 Hon. Iris G Skidmore 415 W. Main St. Ste. 2 Frankfort, KY 40601

Hon. Tom Fitzgerald, Esq. Liz D. Edmondson, Esq. Kentucky Resources Council, Inc. P.O. Box 1070 Frankfort, Kentucky 40602-1070

Hon. Robert Watt Stoll Keenon Ogden, PLLC 300 W. Vine St. Ste. 2100 Lexington, KY 40644

this 24th day of August, 2009

Assistant Attorney General